

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                         |   |                            |
|-------------------------|---|----------------------------|
| JAMES GIBSON,           | ) |                            |
|                         | ) |                            |
| Plaintiff,              | ) |                            |
|                         | ) |                            |
| vs.                     | ) | Case No. 19-cv-04152       |
|                         | ) |                            |
| CITY OF CHICAGO, et al, | ) | Honorable Sara L. Ellis    |
|                         | ) |                            |
| Defendants.             | ) | <b>JURY TRIAL DEMANDED</b> |

**UNOPPOSED PLAINTIFF’S MOTION  
FOR LEAVE TO FILE INSTANTER PLAINTIFF JAMES GIBSON’S  
CORRECTED OPPOSITION TO THE CITY OF CHICAGO’S  
MOTION TO BIFURCATE AND STAY DISCOVERY**

Plaintiff James Gibson, by his undersigned attorneys, moves for leave to file instanter Plaintiff James Gibson’s Corrected Opposition to the City of Chicago’s Motion to Bifurcate and Stay Discovery. In support of this motion, Mr. Gibson states as follows:

1. On January 18, 2021, Mr. Gibson filed his original response (“Opposition to Bifurcation”) (Dkt. 151) in opposition to the City of Chicago’s motion to bifurcate and stay discovery (Dkt. 142).
2. Mr. Gibson’s original Opposition to Bifurcation inadvertently quoted a proposed version of a City Council ordinance rather than the enacted version. In the corrected pleading, Mr. Gibson has corrected this error and provided additional documentary support for the relevant proposition.
3. The parties have conferred about this motion. And the City of Chicago does not oppose it.

WHEREFORE, the Plaintiff respectfully requests that the Court grant him leave to file instanter Plaintiff James Gibson’s Corrected Opposition to the City of Chicago’s Motion to

Bifurcate and Stay discovery and that the Court substitute this corrected opposition for Mr. Gibson's original response.

January 23, 2021

/s/ Andrew M. Stroth

---

Andrew M. Stroth  
Carlton Odum  
Action Injury Law Group, LLC  
191 North Wacker Drive, Suite 2300  
Chicago, IL 60606  
(844) 878-4529  
astroth@actioninjurylawgroup.com  
carlton@actioninjurylawgroup.com

Peter Romer-Friedman  
Gupta Wessler PLLC  
1900 L Street, NW, Suite 312  
Washington, DC 20036  
(202) 888-1741  
*peter@guptawessler.com*

Jennifer D. Bennett  
Gupta Wessler PLLC  
100 Pine Street, Suite 1250  
San Francisco, CA. 94111  
(415) 573-0336  
*jennifer@guptawessler.com*

*Attorneys for Plaintiff*